

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

JONATHAN BOBNAR,

Plaintiff,

v.

ASTRAZENECA PHARMACEUTICALS LP,

Defendant.

Case No. 1:22-cv-02258-PAB

Judge Pamela A. Barker

**DEFENDANT ASTRAZENECA PHARMACEUTICALS LP'S
OPPOSITION TO PLAINTIFF'S MOTION FOR STATUS CONFERENCE**

Defendant AstraZeneca submits this response to Plaintiff Jonathan Bobnar's motion for a status conference regarding the parties' settlement agreement. While Defendant does not object to appearing for a teleconference with the court, Defendant respectfully submits this opposition because a teleconference would needlessly waste the Court's resources. Plaintiff's assertion that Defendant has not complied with the settlement agreement is completely false.

The parties entered into a confidential settlement agreement that became effective on February 28, 2025. Since then, Defendant's counsel has consistently communicated with Plaintiff's counsel, emailing Plaintiff's counsel on February 28, 2025, March 10, 2025, March 14, 2025, March 18, 2025, March 27, 2025, March 28, 2025, and April 1, 2025 to gather information and documents necessary to effectuate the terms of the agreement or respond to Plaintiff's requests for updates. Defendant welcomes the opportunity to submit copies of these email exchanges to the court for *in camera* review, if the Court deems that necessary. They make clear that Plaintiff's representation that Defendant has given him "no information" is patently false.

Defendant has fully complied with the settlement agreement. Defendant has not delayed any performance under the agreement, and Defendant has communicated in good faith with

Plaintiff since it became effective. Defendant is willing to appear for a teleconference if the Court wishes to hear further from the parties on this matter, but Court intervention is unnecessary.

April 4, 2025

Respectfully submitted,

By: MORGAN, LEWIS & BOCKIUS LLP

/s/ Emily C. DeSmedt

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CERTIFICATE OF SERVICE

I, Emily C. DeSmedt, an attorney, certify that on April 4, 2025, I caused a copy of the foregoing to be filed with the Clerk of the Court using the Court's CM/ECF electronic filing system, which will provide electronic notice to all counsel of record.

/s/ *Emily C. DeSmedt*